

Exhibit 4

MARGARET A. FISCHER
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December 19, 2024
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<p>1 UNITED STATES DISTRICT COURT 2 EASTERN DISTRICT OF NEW YORK -----X 3 KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER, LOUIS PIA, THOMAS 4 BARDEN, CONSTANCE MANGAN, and CHARISE JONES, individually and on behalf 5 of all others similarly situated, 6 Plaintiffs, 7 Case No.: 2:23 Civ. 2848 8 (GRB) (ARL) -against- 9 10 GOVERNMENT EMPLOYEES INSURANCE COMPANY D/B/A GEICO, 11 Defendants. -----X 12 13 DEPOSITION of MARGARET A. FISCHER 14 15 December 19, 2024 16 17 New York, New York 18 19 20 21 22 Reported By: 23 Marina Dubson 24 Job #: J12144278 25</p>	<p>1 APPEARANCES: 2 3 OUTTEN & GOLDEN, LLP Attorney for Plaintiffs 4 685 Third Avenue, 25th Floor, New York, New York 10017 5 (212) 245-1000 BY: SABINE JEAN, ESQ. 6 Sjean@outtengolden.com 7 ZARKA DSOUZA, ESQ. Zdesouza@outtengolden.com 8 9 10 DUANE MORRIS, LLP Attorney for Defendant 11 1540 Broadway, 14th Floor, New York, New York 10036 12 (212)471-1856 BY: GREG TSONIS, ESQ. 13 Gtsonis@duanemorris.com 14 15 16 Gil Peretz, Shereck Video, videographer, 17 18 19 20 21 22 23 24 25</p>
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<p>1 2 3 DATE: December 19, 2024 4 5 TIME: 10:00 a.m. 6 7 DEPOSITION of MARGARET A. FISCHER, an 8 opt-in Plaintiff herein, taken by the 9 Defendant, pursuant to Federal Rules of 10 Civil Procedure, and Notice, held at the 11 Duane Morris LLP, 1540 Broadway, 14th 12 Floor, New York, New York 10036, at the 13 above-mentioned date and time, before 14 MARINA DUBSON, a Notary Public of the State of New York. 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 IT IS HEREBY STIPULATED AND AGREED, 2 by and between the attorneys for the 3 respective parties, as follows: 4 5 THAT all objections, except as to the form 6 of the questions, shall be reserved to the 7 time of the trial; 8 9 THAT the within examination may be signed 10 and sworn to before any Notary Public with 11 the same force and effect as if signed and 12 sworn to before the Court; 13 14 THAT filing of the original transcript of 15 the examination is waived. 16 17 18 19 20 21 22 23 24 25</p>

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1 M. A. Fischer
2 Q. Thank you.
3 It then continues in the third
4 sentence: A nonexempt associate who feels
5 he/she did not receive pay for all his/her
6 hours worked and an exempt or salaried
7 nonexempt associate who feels his/her pay
8 incorrectly reflects a deduction for an
9 absence should contact his or her
10 supervisor, local human resources manager,
11 or corporate human resources.
12 Did I read that right?
13 A. Yes.
14 Q. All right. Did you understand
15 that, if you had -- if you felt you didn't
16 receive pay for all the hours that you
17 worked, that you could contact your
18 supervisor, local human resources manager,
19 or corporate human resources?
20 A. Yes.
21 Q. All right. Did you also
22 understand as a Geico associate that Geico
23 maintains a Berkshire Hathaway ethics line?
24 A. Yes.
25 Q. What's the purpose of the

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1 M. A. Fischer
2 Berkshire Hathaway ethics line?
3 A. I believe it was to report any
4 kind of problem that you had.
5 Q. All right. Would that include
6 a problem of not being compensated for all
7 time worked?
8 A. It could be, yeah.
9 Q. Okay. Did you ever try to call
10 the Berkshire Hathaway line?
11 A. No.
12 Q. You would be able to call the
13 line if you wanted to, though, right?
14 A. Correct.
15 Q. Did you ever try to call
16 corporate human resources?
17 A. No.
18 Q. And I'll preface this. I'm
19 talking about being compensated for time
20 that you're alleging that you worked.
21 Okay?
22 Did you ever try to contact
23 Geico corporate human resources?
24 A. No.
25 Q. Did you ever try to contact

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1 M. A. Fischer
2 Geico local human resources manager?
3 A. No.
4 Q. You had the ability to contact
5 Geico's corporate human resources, right?
6 A. Yes.
7 Q. You had the ability to contact
8 Geico's local human resources manager?
9 A. Yes.
10 Q. It also says you could contact
11 your supervisor, correct?
12 A. Yes.
13 Q. Did you ever contact your
14 supervisor?
15 A. We discussed overtime in
16 meetings just in passing, like, everybody
17 knew every -- you know, when we were
18 working.
19 Q. Okay. Let's be more specific
20 about that.
21 Which supervisor are you
22 talking about?
23 A. I don't know. Maybe Danielle.
24 I don't know. But in general, when you
25 would have a group meeting, you know, it

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1 M. A. Fischer
2 would -- you know, people were working
3 more. There was a lot of work to be done.
4 Q. Would you participate in
5 meetings only with major case or with other
6 job titles within SIU?
7 A. Mainly with major case.
8 Q. How many meetings would you
9 have?
10 A. Maybe one a month.
11 Q. Was everybody present in those
12 meetings, meaning field, major case, and
13 inside major case?
14 A. No, just my unit.
15 Q. Did everybody in your unit --
16 well, strike that.
17 I think you said earlier, at a
18 certain point they hired 12 new people, and
19 there was a total of about 18?
20 A. Yes.
21 Q. Did those 18 people report to
22 the same supervisor?
23 A. Two supervisors.
24 Q. Who was the other supervisor?
25 A. Katherine -- what's

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<p>1 M. A. Fischer</p> <p>2 Katherine's -- Cavallo and Kristin Slack.</p> <p>3 Q. Okay. So, you would be a part</p> <p>4 of meetings that happened with your peers</p> <p>5 that reported to Kristin Slack?</p> <p>6 A. Yes.</p> <p>7 Q. Would you be a part of meetings</p> <p>8 for your peers that reported to Kristen</p> <p>9 Cavallo [sic]?</p> <p>10 A. Katherine.</p> <p>11 Q. Katherine Cavallo. Apologies.</p> <p>12 A. Yes, they would put us -- at</p> <p>13 that point, I believe that it was all</p> <p>14 together.</p> <p>15 Q. Okay. So, that was, I guess --</p> <p>16 my question was: Would the two teams have</p> <p>17 separate meetings? Or would it be one big</p> <p>18 group meeting?</p> <p>19 A. One big group meeting when it</p> <p>20 was two teams, I believe, best I can</p> <p>21 remember. It wasn't that long.</p> <p>22 Q. That happened approximately</p> <p>23 once a month -- once a month, you said?</p> <p>24 A. I would think so, yeah.</p> <p>25 Q. Where did they take place?</p>	<p>1 M. A. Fischer</p> <p>2 A. Every few months.</p> <p>3 Q. Okay. During these meetings,</p> <p>4 were there ever concerns about unpaid</p> <p>5 overtime being raised?</p> <p>6 A. No.</p> <p>7 Q. No investigator you ever heard</p> <p>8 raised a concern to a supervisor about</p> <p>9 unpaid overtime?</p> <p>10 A. Not about unpaid overtime.</p> <p>11 Q. Am I understanding correctly</p> <p>12 that some people raised concerns about</p> <p>13 having to work overtime?</p> <p>14 A. That we did work overtime.</p> <p>15 Q. Okay. What was the concern</p> <p>16 that you raised or that others raised?</p> <p>17 A. There was a lot of work that</p> <p>18 had to be done. It takes time to keep</p> <p>19 current.</p> <p>20 Q. Okay. So, was the issue --</p> <p>21 well, strike that.</p> <p>22 Was it you that raised that</p> <p>23 issue or others?</p> <p>24 A. Say it again.</p> <p>25 Q. Was it you that brought that up</p>
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<p>1 M. A. Fischer</p> <p>2 A. In one of the conference rooms,</p> <p>3 I believe, to the best that I can remember.</p> <p>4 Q. Okay. Would people that were</p> <p>5 assigned out of the New Jersey office</p> <p>6 participate?</p> <p>7 A. No.</p> <p>8 Q. What would typically be</p> <p>9 discussed in these meetings?</p> <p>10 A. Any changes that were going on,</p> <p>11 trends that were happening, expectations,</p> <p>12 any updates, any news, things like that.</p> <p>13 Q. Would individual investigators,</p> <p>14 like, present during this meeting? So, I</p> <p>15 guess was it interactive amongst the whole</p> <p>16 group? Or was it more of a download from</p> <p>17 the supervisors?</p> <p>18 A. It would -- the supervisor</p> <p>19 would lead, and then people would add if</p> <p>20 they're asked for questions.</p> <p>21 Q. Would the SIU manager</p> <p>22 participate in these meetings?</p> <p>23 A. Once in a while.</p> <p>24 Q. If you had to estimate, how</p> <p>25 frequently?</p>	<p>1 M. A. Fischer</p> <p>2 and raised that issue? Or was it others?</p> <p>3 A. No. It would just be as part</p> <p>4 of a discussion.</p> <p>5 Q. So, there would be a discussion</p> <p>6 about workload generally is what I'm</p> <p>7 understanding?</p> <p>8 A. Workload, yes.</p> <p>9 Q. Okay. So, you and other</p> <p>10 investigators would have discussions with</p> <p>11 the supervisor about your workload</p> <p>12 generally?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. During the course of</p> <p>15 those discussions, you didn't inform your</p> <p>16 supervisor that you were working overtime</p> <p>17 and not logging it into Workday; is that</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 MS. DSOUZA: Objection.</p> <p>21 BY MR. TSONIS:</p> <p>22 Q. And during those discussions,</p> <p>23 your supervisor didn't instruct you to work</p> <p>24 overtime and not log it into Workday,</p> <p>25 correct?</p>

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1	M. A. Fischer	1	M. A. Fischer
2	E X H I B I T S	2	C E R T I F I C A T E
3		3	
4	DEFENDANT EXHIBITS	4	STATE OF NEW YORK)
5		5	:
6	EXHIBIT EXHIBIT PAGE	5	COUNTY OF RICHMOND)
7	NUMBER DESCRIPTION	6	
8	1 interrogatories 79	7	I, MARINA DUBSON, a Notary Public for
9	2 Workday profile 153	8	and within the STATE OF NEW YORK, do hereby
10	3 human resources 167	9	certify:
11	associate handbook	10	That the witness whose examination is
12	4 Excel spreadsheet 200	11	hereinbefore set forth was duly sworn and
13	5 2017 self-appraisal 213	12	that such examination is a true record of
14	6 Excel spreadsheet 227	13	the testimony given by that witness.
15	7 the operative complaint 233	14	I further certify that I am not
16	8 interrogatories 258	15	related to any of the parties to this
17	9 e-mail chain 270	16	action by blood or by marriage and that I
18		17	am in no way interested in the outcome of
19		18	this matter.
20	(*Exhibits attached to transcript.)	19	IN WITNESS WHEREOF, I have hereunto
21		20	set my hand this 19th day of December 2024.
22	(Cont'd next page.)	21	
23		22	<u>Marina Dubson</u>
24		23	MARINA DUBSON
25		24	
25		25	

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1	M. A. Fischer	1	ERRATA SHEET
2	I N D E X	2	WITNESS NAME: MARGARET. A FISCHER
3		3	PAGE LINE (s) CHANGE REASON
4	EXAMINATION BY PAGE	4	____ ____ ____ ____
5	MR. TSONIS 7, 287	5	____ ____ ____ ____
6	MS. DSOUZA 282	6	____ ____ ____ ____
7		7	____ ____ ____ ____
8		8	____ ____ ____ ____
9	INFORMATION AND/OR DOCUMENTS REQUESTED	9	____ ____ ____ ____
10	INFORMATION AND/OR DOCUMENTS PAGE	10	____ ____ ____ ____
11	BY MR. TSONIS:	11	____ ____ ____ ____
12	1. Request to preserve notes 42	12	____ ____ ____ ____
13	2. Request for notes 43	13	____ ____ ____ ____
14	BY MS. DSOUZA:	14	____ ____ ____ ____
15	3. Request for e-mails 292	15	____ ____ ____ ____
16	4. Request for swipe card activity 293	16	____ ____ ____ ____
17	as well as SICM data	17	____ ____ ____ ____
18	5. Request for yearly goals 293	18	____ ____ ____ ____
19		19	____ ____ ____ ____
20		20	____ ____ ____ ____
21	QUESTIONS MARKED FOR RULINGS	21	
22	PAGE LINE QUESTION	22	-----
23	(None)	23	MARGARET. A FISCHER
24		24	SUBSCRIBED AND SWORN BEFORE ME
25		25	THIS ____ DAY OF _____, 20__.
			_____ (NOTARY PUBLIC) MY COMMISSION EXPIRES: